

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence
of the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington
October 20, 2021

RAVI SUBRAMANIAN, Clerk

By Stefanie Kattler Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

NO. CR21-171 JCC

INDICTMENT

v.

DAVID CABRALES SOLIS and
ROBERTO BETANCOURT,
Defendants.

The Grand Jury charges that:

COUNT ONE

**(Conspiracy to Distribute and Possess with Intent
to Distribute Controlled Substances)**

Beginning on a date unknown, but no later than on or about September 13, 2021,
and continuing until at least on or about October 6, 2021, in King County, within the
Western District of Washington, and elsewhere, DAVID CABRALES SOLIS and
ROBERTO BETANCOURT, and others known and unknown, did knowingly and
intentionally conspire to distribute and possess with intent to distribute substances
controlled under Title 21, United States Code, Section 812, to wit, N-phenyl-N-[1-(2-
phenylethyl)-4-piperidinyl] propenamide (fentanyl), methamphetamine, and heroin.

1 It is further alleged that as to DAVID CABRALES SOLIS and ROBERTO
 2 BETANCOURT, their conduct as members of the conspiracy charged in Count One,
 3 which includes the reasonably foreseeable conduct of other members of the conspiracy
 4 charged in Count One, involved 400 grams and more of a mixture or substance
 5 containing a detectable amount of fentanyl, 500 grams and more of a mixture and
 6 substance containing a detectable amount of methamphetamine, its salts, isomers, and
 7 salts of its isomers, and 100 grams and more of a mixture and substance containing a
 8 detectable amount of heroin.

9 All in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(A),
 10 (b)(1)(B) and 846.

11 COUNT TWO

12 **(Possession of Controlled Substances with Intent to Distribute)**

13 On or about October 6, 2021, within King County, in the Western District of
 14 Washington, DAVID CABRALES SOLIS and ROBERTO BETANCOURT did
 15 knowingly and intentionally possess, and did aid and abet the possession of, with the
 16 intent to distribute, substances controlled under Title 21, United States Code, Section
 17 812, to wit, N-phenyl-N-[1-(2-phenylethyl)-4-piperidinyl] propenamide (fentanyl),
 18 methamphetamine, and heroin.

19 It is further alleged that the offense involved 400 grams and more of a mixture and
 20 substance containing a detectable amount of fentanyl.

21 It is further alleged that the offense involved 500 grams and more of a mixture and
 22 substance containing a detectable amount of methamphetamine, its salts, isomers, and
 23 salts of its isomers.

24 It is further alleged that the offense involved 100 grams and more of a mixture and
 25 substance containing a detectable amount of heroin.

26 The Grand Jury further alleges that this offense was committed during and in
 27 furtherance of the conspiracy charged in Count One, above.

1 All in violation of Title 21, United States Code, Section 841(a)(1), (b)(1)(A), and
2 (b)(1)(B) and Title 18, United States Code, Section 2.

3 **ASSET FORFEITURE ALLEGATIONS**

4 The allegations contained in this Indictment are realleged and incorporated by
5 reference for the purpose of alleging forfeiture.

6 Upon conviction of one or both of the offenses alleged in Counts One and Two,
7 the defendants shall forfeit to the United States, pursuant to Title 21, United States Code,
8 Section 853, any property that constitutes or is traceable to proceeds of the offense, as
9 well as any property that facilitated the offense. This property includes, but is not limited
10 to, a sum of money reflecting the proceeds each defendant obtained from the offense.

11 **Substitute Assets.** If any of the property described above, as a result of any act or
12 omission of the defendants,

- 13 a. cannot be located upon the exercise of due diligence;
14 b. has been transferred or sold to, or deposited with, a third party;
15 c. has been placed beyond the jurisdiction of the Court;
16 d. has been substantially diminished in value; or,
17 e. has been commingled with other property which cannot be divided without
18 difficulty;

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1 it is the intent of the United States to seek the forfeiture of any other property of the
2 defendants, up to the value of the above-described forfeitable property, pursuant to Title
3 21, United States Code, Section 853(p).
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5 A TRUE BILL:

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7 DATED: 20 October 2021

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9 *Signature of Foreperson redacted pursuant*
10 *to the policy of the Judicial Conference of*
11 *the United States.*

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FOREPERSON


NICHOLAS W. BROWN
United States Attorney


THOMAS M. WOODS
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PHILIP KOPCZYNSKI
Assistant United States Attorney